



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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DALLAS TX 75202-2733

July 1, 2014

Mr. Ryan Benefield
Deputy Director
Office of Waste
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Dear Mr. Benefield:

This letter follows the overall programmatic midyear review of the ADEQ's Resource Conservation and Recovery Act (RCRA) hazardous waste program conducted with your staff on May 22, 2014. This review documented the state's progress toward meeting the negotiated 2014 work plan commitments in the Arkansas RCRA, Subtitle C, Section 3011 Cooperative Agreement.

We are pleased that Arkansas met, and in some areas exceeded, 2014 grant commitments. In the area of permitting and permit renewal, ADEQ is 100 percent permitted, and has no backlog of renewals.

We wish to acknowledge the State's timely reporting. Receiving complete reports on time helps EPA provide effective oversight and increases collaboration among my staff and their state counterparts.

The EPA is committed to continuing to work with the ADEQ to provide technical support and training, as needed.

We congratulate you and your staff for your hard work and commitment to protecting the environment and health of the people of Arkansas. If you have any questions after reviewing the enclosures, please call me, at (214) 665-8022.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Q. Spalding".

Susan Q. Spalding
Associate Director for RCRA
Multimedia Planning and Permitting Division

Enclosures

STATE OF ARKANSAS
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) - HAZARDOUS WASTE GRANT PROGRAM
2014 Midyear Report for D-00625114

PROGRAM ELEMENT #1 – AUTHORIZATION

(\$30,000 is allocated for Element #1)

PROGRAM ELEMENT #1- AUTHORIZATION

Objectives: The authorization of States for revisions to the RCRA Subtitle C program supports the Agency objectives of safe waste management and cleanup at hazardous waste sites. The State and EPA maintain a strong commitment to the authorization of State programs, the enhancement of the State and Federal relationship, and to ensure full adoption and authorization for RCRA rules, as soon as possible, and:

1. Promote the Express Authorization initiative so that it is widely used by States by providing timely implementation assistance to States.
2. Reduce barriers to authorization, thereby expediting the authorization process.

Performance Measure: Rules adopted and checklists submitted for authorization demonstrate the State's commitment to participation in the RCRA program. The ADEQ and EPA will view rule adoption and authorization as measures of success.

Activity A: EPA/State Authorization Coordination Activities

- Task 1:** During the year, EPA and ADEQ will actively participate in identifying problems and developing solutions and strategies for the authorization process.
- Task 2:** The ADEQ will support EPA's codification of ADEQ's authorized hazardous waste program.

Activity B: Maintain Equivalency to the Federal Program

- Task 1:** The ADEQ will maintain equivalency to the Federal program during ADEQ-initiated program modifications - statutory, regulatory, and administrative.
- Task 2:** The ADEQ will notify EPA within sixty (60) days of any State legislation changes that could become a national concern or impact the State's authorized program. The State will submit to EPA regulatory changes and State-initiated program modifications - statutory, regulatory, and administrative.

Activity C: EPA Review of Authorization Applications

- Task 1:** There are no pending regulatory revisions for adoption as components of RCRA Cluster XXII and XXIII
- Task 2:** EPA shall review draft applications and provide a complete set of comments on the same to ADEQ within forty-five (45) days of receipt of the application.
- Task 3:** Within 45 days after receipt of EPA's comments on the draft application for RCRA Cluster XXI, ADEQ will prepare and submit a final application to EPA for authorization of these clusters.
- Task 4:** EPA shall initiate the necessary actions to publish the decision on a final application within forty-five (45) days of the receipt of all responses to comments and settlement of any associated issues for that application.

EPA MIDYEAR COMMENTS: On January 2, 2014, EPA forwarded the state's Final RCRA Clusters XX through XXI, which is under final regulatory review. Once EPA completes the final review of the state regulations, EPA will prepare a final federal register to authorize the state to administer portions of the RCRA Program revisions.

RCRA Cluster XXII: The Federal regulation which the State is to adopt in RCRA Cluster XXII "Hazardous Waste Technical Corrections and Clarifications" was due to the Region on September 30, 2013.

RCRA Cluster XXIII due September 30, 2014

The next rules the State will promulgate is the Conditional Exclusions for Solvent Contaminated Wipes which is an Optional rule. This rule is not a mandatory rule. This rule is considered to be less stringent than the existing federal rule. However, if the State chooses not to adopt this optional federal rule, the State's regulation becomes more stringent than the federal rule. In addition, any States that delineate their program for reusable wipes in guidance documents or interpretive letters will need to promulgate enforceable regulations, as required by 40 CFR 271.21(a). Authorized States may specify a different standard or test method for determining that solvent contaminated wipes contain no free liquids (in lieu of the Paint Filter Liquids test). RCRA Cluster XXIII also includes the State's adoption of Hazardous Waste Management System: Conditional Exclusion for Carbon Dioxide (CO₂) Streams in Geologic Sequestration Activities and E-Manifest Rule.

The final rule published on January 3, 2014 was the Hazardous Waste management System: Conditional for Carbon Dioxide (CO₂) Streams in Geologic Sequestration Activities which will become effective on March 4, 2014. This rule will be placed in RCRA Cluster XXIII. The next federal that will also be included in RCRA Cluster XXIII will be the E-Manifest rule which was signed by EPA Administrator on January 13, 2014. The E-Manifest rule will be online by October, 2015.

PROGRAM ELEMENT #2 - PERMITTING & CLOSURE

(\$150,000 is allocated for Element #2)

PROGRAM ELEMENT #2 - PERMITTING & CLOSURE

Objectives: The strategic goals for permit and closure activities at hazardous waste facilities are:

1. Demonstrate substantial progress in permitting land disposal and combustion facilities as determined by the GPRA permitting list of these facilities.
2. Demonstrate substantial progress in reducing risks at inactive land disposal sites.

Grant funds are provided to the State of Arkansas and ADEQ for managing the RCRA program. Targets in the work plan are one means to measure that progress and are not the only means that the state may use to demonstrate appropriate management of the RCRA program. As the universe of available facilities from which to code targets shrinks, EPA's expectation of annual targets will also shrink.

COMMITMENTS			
Activity	RCRA Info Codes	2014 Targets	2014 Midyear Targets Met
Final Determinations or Permit Modifications Incorporating Unpermitted Units for Combustion Facilities (BIF, Incinerator or Miscellaneous Subpart X Units) <i>[GPRA facilities only]</i>	OP200/OP240 & OP270	2	Two Class 3 modifications were completed to add units at Clean Harbors which included two Subpart X modifications and a new incinerator and supporting units. One Class 3 modification was completed for Rineco for the M-106 Unit.
Final Determinations or Permit Modifications Incorporating Unpermitted Units for Land Disposal or Storage Treatment Facilities <i>[GPRA facilities only]</i>	OP200/OP240 & OP270	1	
Final Determinations or Permit Modifications Incorporating Unpermitted Units at Land Disposal Post-Closure Facilities <i>[NON-GPRA facilities]</i>	OP200/OP240 PC200/PC240 & PC270	0	
Permit Renewals for Combustion Facilities, Land Disposal or Storage Treatment Facilities <i>[GPRA facilities only]</i>	OP200 & OP270	0	
Permit Renewals for Combustion Facilities, Land Disposal or Storage Treatment Facilities or Land Disposal Post-Closure Facilities <i>[NON-GPRA facilities]</i>	OP200/OP270 PC200/PC270	1	ADEQ has received the application for the Austin Powder Co. permit renewal.
Closure Plan Approvals/Certifications/Verifications	CL360/CL380 & PC380	0	
ADEQ will undertake activities, as outlined above, to change GPRA facilities from the category "not under control" to "under control".	No code	0	
Other EPA and/or State RCRA Permitting Priorities	No code	0	

Footnote: ADEQ will undertake activities, as outlined above, to change GPRA facilities from the category "not under control" to "under control." EPA and ADEQ will confer as needed via conference call to keep up-to-date on permitting issues.

EPA MIDYEAR COMMENTS: ADEQ has 2 renewals on the 2011-2015 baselines which are not due for renewal thus there is no backlog for renewing permits

PROGRAM ELEMENT #3 - CORRECTIVE ACTION (\$250,000 is allocated for Element #3)

Objective: The Corrective Action program has three overriding program goals:

1. Focus program resources and actions at GPRA priority facilities.
2. Maximize actual environmental results.
3. Streamline and accelerate the pace of the program.

RCRAInfo Codes	Corrective Action Activity	FY2013 Targets	FY2013 Midyear Targets Met
CA725	Human Exposures Controlled (total completed by End of Year)	0	
CA750	Groundwater Releases Controlled (total completed by End of Year)	0	
CA400	<u>Entire Facility Remedy Selected/Corrective Measures Imposed (total completed by End of Year)</u>	2	Timex Corporation (ARD006349724) – CA400 Remedy Selection - RADD Final CAO Amendment Effective Whirlpool Corporation (ARD042755389) CA400 Remedy Selection
CA550	<u>Entire Facility Remedy Completed or Construction Completed (total completed by End of Year)</u>	0	
	Other EPA and/or State Corrective Action Priorities	0	
CA350 CA375 CA400	Corrective Measures (CMS) Reports Approved Decision on Petition for No Further Action Remedy Selected/CM Imposed (Unit Level)	2	
CA550 CA600 CA650 CA999	Remedy Completed or Construction Completed (Unit Level) Stabilization Measures Implemented Stabilization Measures Completed CA Terminated (Entire Facility) CA Terminated (Entire Facility)	0	

Footnote: ¹ ADEQ reserves the right to trade out the 1 CA 550 corrective action activity listed in "Entire Facility Remedy Selected/Corrective Measures imposed" for other Corrective Action activities that at least equal the man hours committed to in this Program Element.

² Total completed by End of Year

	Achievements/Projections for 31 Arkansas Facilities on the Region 6 GPRA 2020 Baseline as related to the 2020 GPRA Region 6 Goals					
	FY09*	FY11**	FY12***	FY13****	FY14 Actual vs Grant	FY20 Goal
CA725 Human Exposures	30/31 (97%)	31/31 (97%)	31/31 (100%)	30/30 (100%)	0/0	29 (95%)
CA750 Ground Water	26/31 (84%)	29/31 (90%)	29/31 (94%)	28/30 (93%)	0/0	29 (95%)
CA400 Remedy Selection	25/31 (81%)	28/31 (87%)	28/31 (90%)	28/30 (90%)	0/0	
CA550 Construction Complete	20/31 (65%)	23/31 (74%)	24/31 (74%)	24/30 (80%)	0/0	29 (95%)
	<p>* Actual number of total facilities on baseline achieving measurement as of 10/13/2009. ** Actual number of total facilities on baseline Achieving measurement as of 09/30/2011. *** Actual number of total facilities on baseline Achieving measurement as of 09/30/2012. **** Actual number of total facilities on baseline Achieving measurement as of 03/31/2013.</p>					

CORRECTIVE ACTION STREAMLINING AND RE-USE ACTIVITIES WITH ADEQ

Objectives: The corrective action program is now driven by four new site-wide GPRA environmental indicators (EIs): the control of current human exposure (CA725), the control of the migration of contaminated ground water (CA750), remedy selected (CA400) and construction complete (CA550). EPA included the first two indicators as performance objectives for high-priority RCRA facilities to be achieved by the end of FY 2005, and subsequently set a new goal to achieve 95% completion for CA 725 and CA550 corrective action goals by FY 2020. ADEQ has made great progress over the past several years in instituting corrective action streamlining concepts into their cleanup program.

Activity A: Region 6 and ADEQ will continue to work together to further develop and implement practical, innovative, performance- and risk-based corrective action strategies to achieve both State and Federal cleanup goals and priorities. Streamlined approaches used during sampling, analysis, and document submittals will lead to smarter, faster work strategies resulting in long term protective remedies. Lessons learned from these approaches will be used to guide the way data is collected and analyzed for future site cleanup decisions in other state programs and regions.

Activity B: ADEQ will continue to support the RCRA Brownfields and Ready for Re-use programs..

Activity C: Region 6 and ADEQ will work together to implement the new land reuse measures and indicators pursuant to the EPA's February 21, 2007 "Guidance for Documenting and Reporting RCRA Subtitle C Corrective Action Land Revitalization Indicators and Performance Measures."

Activity D: ADEQ will assist Region 6 in obtaining and verifying land reuse measures and indicators information for the 2008 and 2020 GPRA baseline facilities which is not available in the RCRAInfo database. Such information may include:

- Cleanup status (e.g., CA 725, 750, 400, 550, 800, or 999) for site-wide or area-specific determinations;
- Institutional controls and/or engineering controls in place;
- Acres
- Types of use; and
- Status of use

Activity E: ADEQ and EPA will continue to work cooperatively in reviewing Arkansas's identified Federally Utilized Defense (FUD) site investigation and remediation reports. Comments resulting from those reviews will be shared with each other.

EPA MIDYEAR COMMENTS: In the first half of the grant year, no Ready for Reuse candidate facilities were identified, and no area- or facility-wide Ready for Anticipated Use (RAU) determinations were coded in RCRAInfo. However, on April 2, 2014, ADEQ submitted to EPA supporting documentation for a number of area-specific RAU determinations at three facilities: Pine Bluff Arsenal (3 units), Little Rock Air Force Base (4 units), and Lion Oil Company (6 units). The documentation also included CA 725 determination forms for SWMU 32 at Little Rock Air Force Base and SWMU 83 at Pine Bluff Arsenal.

In the second half of the grant year, EPA will discuss with ADEQ scheduling the IC/EC training for state project managers. Timing and actual delivery method will be contingent on availability of travel funding and EPA/ADEQ staff availability.

PROGRAM ELEMENT #4 - PROGRAM MANAGEMENT**(\$65,000 allocated for Element #4)**

Objectives: The EPA will transmit all significant guidance documents to ADEQ with a cover letter clearly stating the purpose of the documents. Within forty-five (45) days after receipt, ADEQ will provide EPA a written response identifying any problems with guidance implementation. The EPA and ADEQ will arrive at a solution/decision on guidance implementation pursuant to the EPA/ADEQ Memorandum of Agreement (MOA).

Activity A: Quality Assurance

The ADEQ must submit an updated FY 2014 Quality Assurance Project Plan (QAPP) 60 days prior to October 1, 2013. If there have been no changes to the QAPP from FY 2013, ADEQ must submit a new signature page and documentation stating that the QAPP is current

Activity B: Training

The ADEQ will present the RCRA core curriculum courses or their equivalent as needed for new staff and ensure all ADEQ personnel are kept up-to-date in all new rules and regulations. Training for RCRA inspectors must be provided to ensure compliance with EPA Order 3500.1.

EPA MIDYEAR COMMENTS: The state's FY 2014 QMP was submitted February, 2014, was approved as submitted, and is valid until February 27, 2015, the FY 2014 QAPP was submitted July 26, 2013, was approved as submitted, and is valid until September 30, 2014.

ADEQ provides staff training and ensures that staff maintains required certifications. EPA's opportunities to present training, including authorization, RCRAInfo, and land revitalization, are restricted by the Agency's reduced travel budget. Region 6 is working to create online training where possible.

PROGRAM ELEMENT #5 - INFORMATION MANAGEMENT**(\$60,000 allocated for Element #5)**

Objective: The ADEQ must maintain RCRAInfo databases in order to provide a complete and accurate picture of program accomplishments. The data retrieved from RCRAInfo should be reliable in order to support RCRA program goals.

The reporting of nationally-required RCRAInfo core elements is essential to properly review and track RCRA program progress at all RCRA-regulated facilities and identify the accomplishment of Government Performance and Results Act (GPRA) goals.

Activity A: RCRAInfo

The ADEQ will enter all quality-assured RCRAInfo data into the EPA database by the seventh working day of each month. The ADEQ should review and improve the current RCRA universes to assure a nationally consistent information base. The ADEQ will make corrections to historical data in RCRAInfo as time and other workload commitments permit.

Activity B: Institutional Control (IC) and Engineering Control (EC) Information

ADEQ will collect, compile, perform quality assurance checks, and upload finished data for the 2013 Biennial Report in accordance with the 2013 Biennial Report National Implementation Schedule.

Activity C: Institutional Control (IC – CA772) and Engineering Control (EC – CA770) Information

ADEQ will continue to enter into RCRAInfo and maintain updates for all institutional control (IC) and engineering control (EC) information necessary to adequately review and track RCRA program progress toward GPRA goals. The objective of collecting and tracking this information is to ensure that remedies implemented remain protective over time.

EPA MIDYEAR COMMENTS: Financial Assurance data in the FA module of RCRAInfo is currently out of date. ADEQ needs to update as soon as possible.

The deadline to submit BR data to RCRAInfo for the Preliminary Report is April 1, 2014 and November 3, 2014 for the Final Report.

EPA will continue to review the historical RCRAInfo data in all modules for accuracy, work with ADEQ to research and correct the data and provide assistance and training with current data entry as needed.

PROGRAM ELEMENT #6 - COMPLIANCE MONITORING**(\$350,000 allocated for Elements #6 and #7)**

Objectives: Before the fiscal year begins, EPA and ADEQ will agree on the universe of facilities from which Compliance Evaluation Inspections (CEI), Comprehensive Ground-Water Monitoring Evaluation (GME) and Operation & Maintenance Inspections (O&M) will be selected. Should the inspection universe for ADEQ change during the year, adjustments will be made to which facilities are inspected but not to the number of inspections to be conducted as the universe is expected to fluctuate throughout the year.

Activity A: ADEQ Inspection Activities

Task: ADEQ will conduct required inspections at hazardous waste facilities. This includes, at a minimum, 50% of the TSDF universe, and 100% of the federal TSDF universe. Additionally, ADEQ will inspect 20% of the LQG universe (5 year goal of inspecting all active LQGs), unless ADEQ seeks approval of an alternative inspection plan in accordance with the National Program Managers' Guidance. The LQG universe will be determined based on the information in RCRAInfo no later than August 1 of each year. (As of August 1, 2013, Arkansas's BR LQG universe includes 144 facilities.)

ACTIVITY	FY14 TARGET	MIDYEAR ACCOMPLISHMENT
CEIs @ operating Federal TSDF Universe (1)	100% of Universe 1	0 (0%)
CEIs @ operating non-Federal TSDF Universe (11)	50% of Universe 6	6 (100%)
CEIs @ non-TSDF LQG Universe (144)	20% of Universe 29	19 (65.5%)
Comprehensive Ground-Water Monitoring Evaluation (GME)	1	0 (0%)
Operation & Maintenance Inspections (O&M)	3	1 (33.3%)
CEIs @ non-TSDF SQGs		3
CEIs @ non-TSDF CESQGs		2
Focused Compliance Inspections (FCIs)		4
Non-Financial Record Reviews (NRRs)		37
Financial Record Reviews (FRRs)		4
Corrective Action Compliance Evaluations (CACs)		1

Screen-printed jackets, caps, and shirts will be procured and issued to all ADEQ field staff for visibility and safety during routine compliance monitoring inspections, special investigations, and emergency responses. These items will have identifying information, making the field personnel easily recognizable to the public, regulated community, first responders, and other regulators.

EPA MIDYEAR COMMENTS: ADEQ has met its FY14 target of conducting inspections (CEIs) at 50% of its non-Federal TSDF universe (completed 6 of 11)

ADEQ has completed 65.5% of its FY14 target of conducting inspections (CEIs) at 29 of its non-TSDF LQG universe (completed 19 of 29)

ADEQ has not completed its FY14 target of conducting inspections (CEIs) at 100% of its federal TSDF universe (1)

Other FY14 Commitments:

ADEQ has completed 33% of its targeted Operation & Maintenance Inspections (O&M) (completed 1 of 3)

ADEQ has not completed its 1 Comprehensive Groundwater Monitoring Evaluation (GME)

PROGRAM ELEMENT #7 – ENFORCEMENT**(\$350,000 allocated for Elements #6 and #7)**

Objective: Maintain a high rate of compliance in accordance with the EPA Enforcement Response Policy (ERP) by taking timely, visible, and appropriate enforcement action against violators..

EPA MIDYEAR COMMENTS: ADEQ appears to be meeting its objective to maintain a high rate of compliance in accordance with the EPA Enforcement Response Policy (ERP) by taking visible and appropriate enforcement action against violators (10 formal enforcement actions [9 included penalty] against 9 facilities, and 80 informal enforcement actions against 76 facilities).

ADEQ made a timely SNC designation for all 10 formal enforcement actions. ADEQ took 8 of the 10 formal enforcement actions within 360 days of Day Zero. The remaining 2 formal enforcement actions were taken against the same facility within 381 days and 392 days. All 10 formal enforcement actions have been settled.

RCRAInfo report “CM&E SNC Status Report” dated May 14, 2014, identified 11 Unaddressed SNCs; however, only one is beyond the 360-day timeline. The delay in this case is due to novel legal issues. ADEQ will submit an additional alternative enforcement letter to EPA.

Environmental Protection Agency (EPA) Region 6
Resource Conservation and Recovery Act
State Hazardous Waste Program
Oversight Process

State Agency
Hazardous Waste Management Program

Prepared by the EPA Region 6
Multimedia Planning and Permitting Division

Grant #D-00625114
Midyear FY 2014
10/01/2013 – 03/31/2014

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1. INTRODUCTION

States that have been authorized under Section 3006 of the Solid Waste Disposal Act, as amended, administer most of the hazardous waste programs under the Resource Conservation and Recovery Act (RCRA) in Region 6. The state programs are administered in Arkansas, Louisiana, New Mexico, Oklahoma and Texas. The Environmental Protection Agency (EPA), however, retains significant responsibilities with Congress for ensuring that the states are administering programs that comply with the federal RCRA statutes and regulations. This document outlines the Region 6 process for conducting oversight of the state RCRA programs. This is a “living document” that will be continually improved and updated according to the national Annual Commitment System goals and measures.

1.1 Purpose

The purpose of this document is to provide clear goals and an outline of measures to use in federal oversight of the RCRA program in Region 6 states. Overall, it provides a clarification of the EPA’s current policy for state oversight and a venue for documenting EPA’s oversight activities. This document also provides an update on a semiannual basis of state and EPA activities supporting the state RCRA program, highlights state accomplishments, and identifies areas where improvements are needed to achieve RCRA program goals.

1.2 Policy Statement

The EPA will oversee implementation of the authorized state program in order to ensure full execution of the requirements of RCRA and to promote national consistency in the implementation of the hazardous waste program. The EPA will conduct and document state oversight through mid- and end of year reviews as well as periodic permitting and corrective action program reviews. The EPA Region 6 will continue to work in partnership with the states to achieve results that support our common goal of protecting human health and the environment.

2.0 OVERSIGHT ACTIVITIES

The RCRA Hazardous Waste Program is made up of a number of components: permitting, corrective action, compliance assurance and enforcement, information management, and authorization. This document addresses permitting, corrective action, authorization, and information management through the Multimedia Planning and Permitting Division. The Compliance Assurance and Enforcement Division has an oversight process for their respective program, known as the State Review Framework. The RCRA Project Officers work closely with members of each program area to ensure effective implementation of the state-delegated program. The oversight and monitoring of state cooperative agreements (the type of assistance agreement used in the RCRA program) is an ongoing process that includes ensuring that all programmatic terms and conditions in the award agreement are satisfied.

The EPA's oversight activities are centered on four components: 1) the cooperative agreement process; 2) the authorization process; 3) the technical assistance and permit review process; and, 4) data management. Actions that enhance the overall effectiveness of the RCRA program through forward-moving national initiatives are captured in the Sustainability Programs Section. In addition, Region 6 RCRA program oversight is also accomplished by State Permitting Program Reviews and State Corrective Action Program reviews.

2.1 SECTION 1: COOPERATIVE AGREEMENT PROCESS

- Review of the state's application for Section 3011 funding, including a thorough review of the costs associated with the activities to be accomplished;
- Negotiation of a work plan that reflects both state and EPA goals and responsibilities for the authorized RCRA program;
- Approval of a Quality Assurance Project Plan and Quality Management Plan before work begins;
- Communication with the state, through monthly conference calls if appropriate, to identify problems and successes as early as possible; and,
- Formal review of the state's performance at mid and end-of-the-fiscal year, each followed by a report to the state.

2.1.1 States' Reporting Requirements

Thirty calendar days following the mid-point and the end-of-the-project period, the states will submit progress reports containing a summary of activities conducted and issues encountered during the project period. The evaluation reports will contain a comparison of actual accomplishments to the objectives established for the period. Where the output of the project can be quantified, a computation of the cost per unit of output may be required if that information will be useful. The reports will also contain reasons for slippage if established objectives were not met and additional pertinent information including, when appropriate, analysis and

explanation of cost overruns or high unit costs. The reports will include information about staff training.

The final End-of-Year progress report will be due 90 days after the expiration or termination of grant support. The final End-of-Year progress report should contain a self-evaluation of program activities, reflecting on the aspects of the program that were successful, and those that were unsuccessful. Each state must submit a final Financial Status Report no later than 90 calendar days after the end of the project period.

Events may occur between the scheduled performance reporting dates which have significant impact upon the grant or subgrant supported activity. In such cases, the grantee must inform the EPA as soon as the following types of conditions become known:

- Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation.
- Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated, or producing more beneficial results than originally planned.
- If the state's objectives or goals have changed, or if they foresee problems in meeting the end goals, the evaluation report must discuss the situation and provide a plan of action with an associated time frame for addressing the problem.
- Any proposed modifications to basic statutory or regulatory authority, program forms, procedures or priorities. The state shall submit a modified program description, Attorney General's Statement, MOA or other documents as the EPA determines to be necessary in accordance with 40 CFR 271.21(a).

2.1.2 Monitoring and Measuring Cooperative Agreement Commitments:

Monitoring commitments consists of tracking the state's progress with implementation of the RCRA program as well as conducting a joint analysis with each state. The joint analysis includes evaluating the project outputs, identifying success, identifying opportunities for enhancement, identifying appropriate solutions, and tracking progress of action items. Follow-up on these items is essential to monitoring progress.

The purposes for monitoring program progress are to:

- Identify project outputs, successes, and opportunities for enhancement;
- Provide recommendations and associated time frames for addressing opportunities for improvement;
- Identify action items and follow-up on previously identified action items;

- Follow-up and document the status of EPA recommendations; and,
- Provide a communication mechanism to management on the successes and opportunities for enhancement.

2.2 SECTION 2: AUTHORIZATION PROCESS

The workload for each Region 6 state's RCRA Program has increased steadily over time due to increased authorization of RCRA rules to the states. More than 322 rules have been promulgated under RCRA since the statute was signed into law in 1976. Consistent with the national policy that RCRA is designed to be implemented by the states, Region 6 states have sought and been authorized to implement most of the federal program, including the RCRA "base program" (authorized in 1984).

Some of the major rules, e.g., Corrective Action and Post Closure rules, are HSWA, therefore, under the amended Section 3006(g) of RCRA, 42 U.S.C. 6926(g), new requirements and prohibition imposed by the HSWA take effect in authorized states at the same time as they take effect in non-authorized states. The EPA is directed to carry out those requirements and prohibitions in authorized states, including the issuance of full or partial permits, until the state is granted authorization to do so. While states must still adopt HSWA-related provisions as state law to retain final authorization, the HSWA applies in authorized states in the interim.

As a result of the HSWA, when final authorization is granted to a state, there will be a dual state/federal regulatory program. To the extent the authorized state program is unaffected by the HSWA, the state program will operate in lieu of the federal program. To the extent HSWA-related requirements are in effect, the EPA will administer and enforce these portions of the HSWA in a state until the state receives authorization to do so. Among other things, this will entail the issuance of federal RCRA permits for those areas in which the state is not yet authorized.

Once the state is authorized to implement a HSWA requirement or prohibition, the state program in that area will operate in lieu of the federal provision. Until that time the state may assist the EPA's implementation of the HSWA outlined in the state's MOA. If a state's requirements are more stringent than the federal requirements, HSWA provision will also remain in effect; thus regulated handlers must comply with any more stringent state requirements.

2.2.1 Hazardous Waste Combustion under RCRA and Clean Air Act

When the EPA promulgated MACT EEE regulations for hazardous waste combustion under the Clean Air Act (CAA), it envisioned integration of both RCRA and MACT requirements for emissions standards. The EPA does not anticipate a hazardous waste combustion unit to be regulated for compliance with emissions standards under both RCRA and CAA. For both incinerators and boilers, the RCRA emissions standards would not apply once an owner or operator of an existing hazardous waste unit has demonstrated compliance with MACT requirements under Part 63 Subpart EEE.

It was expected that once a state has received authorization for both RCRA (Cluster XVIII, Checklist 217) and MACT EEE under the CAA program, the RCRA permit conditions related to the emissions standards would be removed from the RCRA permit and transferred to the Title V operating permit under the CAA. Until then, however, the RCRA permit conditions that were based on the MACT EEE emissions standards will continue to be in effect in the RCRA permit. Even after the transfer of emissions related RCRA permit conditions to the air program, the RCRA program will continue to enforce all other RCRA permit conditions related to the waste management, financial assurance and closure requirements.

Until the state receives both above mentioned RCRA authorizations and MACT EEE delegation, the EPA will continue to remain the authority for approval of the MACT EEE comprehensive performance test (CPT) plans, alternative monitoring application (AMA) requests, methods modification requests for sampling and analyses, and issuing Finding of Compliance based on the test results. Even after the state has received such RCRA and MACT EEE authorization/delegation, the EPA will continue to be the authority for approval of: (a) Major Alternative Monitoring Applications requests, and (b) all Major, Intermediate and Minor requests for sampling and analytical methods.

Status of RCRA Cluster XVIII Authorization and MACT EEE Delegation				
	AR	OK	TX	LA
RCRA Authorization Cluster XVIII (NESHAP MACT EEE)	Yes	Yes	Yes	Yes
CLEAN AIR ACT – Title V Delegation	Yes	Yes	Yes	Yes
MACT (EEE) Delegation Air Program	No	Yes	No	Yes
MACT EEE CPT Plan Approval	EPA	Yes	EPA	Yes
Approval of Major AMA Requests	EPA	EPA	EPA	EPA
Approval of Intermediate and Minor AMA	EPA	Yes	EPA	Yes
Approval of All Sampling and Analytical Method Modification Requests	EPA	Yes	EPA	Yes
Issuing Finding of Compliance	EPA	Yes	EPA	Yes

Note: New Mexico does not have any hazardous waste combustion unit.

2.2.2 Monitoring and Measuring Authorization Progress:

The states' regulations are being monitored by the Headquarters' State Authorization Tracking System (StaTS). StaTS is an information system designed to document the progress of each state and territory in establishing and maintaining RCRA-authorized hazardous waste management programs. StaTS tracks the status of each state with regard to changes made to the federal hazardous waste regulations. Authorization information is updated on a quarterly basis. Adoption information is updated twice a year, after the second and fourth quarters.

Another way that the EPA Region 6 meets its oversight responsibilities is through the codification process. This process provides a means for monitoring state authorized programs by ensuring that states remain in compliance with the requirements of 40 CFR Part 271. Specifically, as part of the codification process, the EPA:

1. Evaluates state statutory authorities and procedures to ensure that they remain consistent with 40 CFR 271.6, 271.7 and 271.8;
2. Identifies state-initiated changes to the authorized program that have not been formally submitted to the EPA for review and approval in compliance with 40 CFR 271.21; and,
3. Evaluates state hazardous waste compliance monitoring and enforcement requirements to ensure that they remain consistent with the requirements of 40 CFR 271.15 and 271.16.

2.3 SECTION 3: TECHNICAL ASSISTANCE AND REVIEW PROCESS

Region 6 has historically provided technical assistance to states in a wide variety of program areas including program and information management, regulatory interpretations, technical assistance in areas such as ground water modeling, and other corrective action areas such as characterization of contamination, risk characterization and remedy selection/design.

2.3.1 Permit Oversight and Permit Review Program

As part of the EPA's oversight role, Region 6 will monitor the issuance of both draft and final permits along with significant permit modifications for technical and programmatic consistency.

The EPA routinely reviews draft and final permits that are received and will continue to do so. The criteria for selecting permits for or the annual oversight review will consist of: coordinating with each state on which applications would receive the most benefit from an oversight review (such as active community engagement, high profile and type of facility), the types of permits, and the availability of documentation. The Region will request all permit information required for the review from the state agency authorized to implement the RCRA program. If the state is not able to provide the needed information, then the Region will coordinate with the state to contact the facility directly to obtain the information. These reviews will allow the EPA to monitor the state's permitting program by reviewing permits for technical and programmatic consistency with the federal requirements. Some of the elements included in this review include the permitted units, basic permit requirements, financial assurance requirements, closure requirements, and schedules for corrective action completion.

The EPA will negotiate with each state on the number of permits to be reviewed in the state during the year.

As part of the permit program oversight, the Region has implemented the RCRA Permitting Program review. This review is rotated among the Region 6 states. During this review, the EPA gathers information on a variety of areas, such as staffing, the permitting process and program strengths. Other areas Region 6 will review include how the state implements public participation, financial assurance requirements, and the status of permitting actions for both new facilities and renewal permits. The Program Review is conducted during an on-site meeting with the state and a draft report will be provided for state review. The EPA's goal is to complete the review and finalize the report before the End of Year review.

2.3.2 Monitoring and Measuring Permit Progress

One of the EPA's goals is to have approved controls in place at permitting baseline facilities in order to prevent releases from RCRA hazardous waste management units. The agency's second goal is to update controls by reaching our permit renewal goal. These goals along with the Region 6 individual permit reviews and the Permitting Program Review, which include reviews for technical and programmatic consistency with the federal requirements, are how the EPA will measure the effectiveness of a state's permitting program.

2.3.3 Monitoring and Measuring Corrective Action Progress

To monitor a state's corrective action program, in addition to the corrective action tracking system for the attainment of the 2020 GPRA Corrective Action goals, the EPA will review remedy selection decision documents, i.e., Statement of Basis, Remedial Action Decision (RADD) documents, or a Basis of Decision document or Fact Sheet. At least one document per state will be reviewed each grant year, during or after, the remedy selection process, for technical and programmatic consistency with the federal requirements. Corrective action documents other than remedy decision documents may be substituted or added at the EPA's discretion. The criteria for selecting documents will consist of coordinating with each state on which documents will receive the most benefit from an oversight review (such as active community engagement, high profile and type of facility), and the availability of documentation. The Region will request all corrective action information required for the review from the state agency authorized to implement the RCRA program. If the state is not able to provide the needed information, then the Region will coordinate with the state to contact the facility directly to obtain the information.

In addition, as part of corrective action oversight, the Region has implemented the RCRA Corrective Action Program Review. This review is rotated among the Region 6 states. During this review Region 6 will gather information on staffing, corrective action process and corrective action status. In addition, the EPA will review the information with the states during a meeting. The review will be finalized before the End of Year grant review meeting or conference call.

2.4 SECTION 4: DATA MANAGEMENT PROCESS

The states must maintain the RCRAInfo database in order to provide a complete and accurate picture of all program accomplishments and to support RCRA program goals developed for

GPRA. Reporting of the nationally required RCRAInfo core elements is required to properly evaluate and track RCRA program progress. A complete list of the nationally defined and required values for both Permit Event Codes and Corrective Action Event Codes may be found on the RCRAInfo website - <https://rcrainfo.epa.gov/> - under the "Help" screens.

2.4.1 Monitoring and Measuring Data Management

Data management reviews are part of the midyear and end-of-year review process, as covered under the Cooperative Agreement process. Data and Program Profiles will be generated periodically throughout the year to properly analyze both the quality of the data and program accomplishments. Those Profiles and reviews will be made available as part of the regular program reviews.

2.5 SECTION 5: PROGRESS OF SUSTAINABILITY PROGRAMS

The EPA and the states work together to promote several national initiatives. The EPA Region 6 would like all of its states to incorporate sustainability into their RCRA projects. Furthermore, Region 6 would like to engage its states and other stakeholders for thoughts on sustainability and applicable processes that could maximize social, environmental and economic benefits. A few examples of these programs are Environmental Justice analysis, risk assessment/risk management, green remediation, stormwater management, sustainable energy and environmental footprint analysis. Since these are voluntary programs, a state's participation is much appreciated and all state efforts will be viewed as enhancements to the overall RCRA program.

Susan Spalding
Associate Division Director for RCRA Programs
Multimedia Planning and Permitting Division

Date: _____

Randall Rush, Chief
State/Tribal Oversight Section
Multimedia Planning and Permitting Division

Date: _____

Melissa Smith, Chief
Corrective Action/Waste Minimization Section
Multimedia Planning and Permitting Division

Date: _____

Cathy Carter, Chief
Strategic Planning/Information Management
Section
Multimedia Planning and Permitting Division

Date: _____

Laurie King, Chief
Federal Facilities Section
Multimedia Planning and Permitting Division

Date: _____

Kishor Fruitwala, Chief
Facility Assessment Section
Multimedia Planning and Permitting Division

Date: _____

ATTACHMENT A
6PD RCRA PROGRAM REVIEW CHECKLIST

Midyear FY 2014

Date of Evaluation: May 2014

Program: RCRA Section 3011 Hazardous Waste Management Program

Delegated State: Arkansas Department of Environmental Quality

Grant #: D-00625114

EPA Contacts:
Program Manager: Susan Spalding
Grants/Project Officer: Terrie Wright
Technical Assistance Coordinator: Nancy Fagan

State Contacts: Tamara Almand, Tammie Hynum

PROGRAM REVIEW INDICATOR	STATUS	EPA COMMENTS & RECOMMENDATIONS
SECTION 1: COOPERATIVE AGREEMENT PROCESS		
1a) Annual grant commitments	On-going.	ADEQ will complete all work plan commitments by the end of the fiscal year.
1b) Grant funds used appropriately.	ADEQ's drawdowns of grant funds are being used appropriately.	As of March 31, 2014 (midyear for the FY2014 grant period) ADEQ had expended \$461,898.30 in grant funds. At the midyear EPA has awarded all of the allotted FY 2014 funds to ADEQ.
1c) Timeliness and completeness of QAPP and QMP	ADEQ's QMP and QAPPs are both valid at the time of the midyear and are submitted and approved within a timely manner.	<p>The state's QMP was received February 27, 2014, was approved as submitted, and is valid until February 27, 2015.</p> <p>The state's QAPP was submitted July 26, 2013, was approved as submitted, and is valid until September 30, 2014</p>
1d) Timeliness and completeness of reports	<p>The Midyear Report was submitted in a timely manner.</p> <p>The End of Year Report is due October 30, 2014.</p>	The midyear report for FY 14 was received April 18, 2014.
1e) Any changes that may impact implementation of RCRA program reported to the EPA in a timely manner	No changes have been made that may impact implementation of the RCRA program.	None
1f) Staff training performed and reported to the EPA	ADEQ provided EPA comprehensive list of training provided to staff during grant year FY13.	Region 6 is developing alternatives (i.e., webinars) in order to provide training on Ready for Reuse and Land Revitalization. Authorization and IC/EC, while operating with a reduced travel budget.

SECTION 2: AUTHORIZATION PROCESS

2a) State is authorized for current RCRA Rules Clusters	RCRA Cluster submitted RCRA Clusters XX through XXI on January 2, 2014.	RCRA Clusters XX through XXI is under final regulatory review.
2b) Timeliness and completeness of authorization packages	<p>RCRA Cluster XX and XXI</p> <p>RCRA Clusters XX and XXI are overdue. RCRA Clusters XX and XXI final applications were due to the Region September 30, 2011 and September 30, 2012 respectively. However, EPA received the final application on January 2, 2014.</p>	<p>Two federal rules in RCRA Cluster XX are Non-HSWA provisions. The rules are promulgated pursuant to Non-HSWA authority and are considered to be neither more nor less stringent than the current federal requirements. Therefore, there is no impact on the state's program.</p> <p>However, OECD Requirements: Export Shipments of Lead-Acid Batteries is a mandatory rule; therefore, EPA implements this rule because it is not delegable to states. Because of the federal government's special role in matters of foreign policy, EPA does not authorize states to administer federal import/export functions in any section of the RCRA hazardous waste regulations. But states are required to adopt the rule.</p> <p>The second Non-HSWA rule in RCRA Cluster XX which has some of HSWA provision is the Hazardous Waste Technical Corrections and Clarifications Rule. States are required to adopt the revisions to the manifest regulations (the addition of paragraph 262.23(f)) in accordance with the consistency requirements in 271.4(c). 40 CFR 262.23 is part of the manifest requirements. The remaining revisions are technical corrections with no impact. Lastly Withdrawal of the Emission Comparable Fuel Exclusion under RCRA also is a Non-HSWA provision. Therefore no impact on the State's program. The state's adoption are necessary to make conforming changes to all appropriate parts of the RCRA hazardous waste regulations for new rules that have since been promulgated. Other than that, the rule is an optional provision.</p>

<p>2c) Meets authorization requirements</p>	<p>When EPA authorizes the State for RCRA Cluster XXI, the State will meets its authorization requirements.</p> <p>RCRA Cluster XXIII: is due the Region by September 30, 2014.</p>	<p>The Submitted final RCRA Cluster XXI on January 2, 2014 which is under final regulatory review by EPA. ,The Rules in RCRA Cluster XXI are Removal of Saccharin and Its Salts from the Lists of Hazardous Constituents Technical Corrections to Academic Laboratories Generator Standards and Revisions of the Land Disposal Treatment Standards for Carbamate Wastes. These two rules are Non-HSWA. The rules are promulgated pursuant to non-HSWA authority and are considered to be neither more nor less stringent than the current federal requirements. Therefore, there is no impact on the state's program. The Revisions of the Land Disposal Treatment Standards for Carbamate Wastes is a HSWA provisions therefore, this rule is promulgated pursuant to HSWA authority and is considered to be neither more nor less stringent than the current federal requirements. No impact to the State's program.</p> <p>The State was advised at the midyear review to submit a final application for RCRA Clusters XX through XXI for authorization in order to meet its authorization commitments. The next rules the State will promulgate is the Conditional Exclusions for Solvent Contaminated Wipes which is an Optional rule. This rule is not a mandatory rule. This rule is considered to be less stringent than the existing federal rule. However, if the State chooses not to adopt this optional federal rule, the State's regulation becomes more stringent than the federal rule. In addition, any States that delineate their program for reusable wipes in guidance documents or interpretive letters will need to promulgate enforceable regulations, as required by 40 CFR 271.21(a). Authorized States may specify a different standard or test method for determining that solvent contaminated wipes contain no free liquids(in lieu of the Paint Filter Liquids test).</p> <p>The final rule published on January 3, 2014 was the Hazardous Waste management System: Conditional for Carbon Dioxide (CO2) Streams in Geologic Sequestration Activities which will</p>
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		become effective on March 4, 2014. This rule will be placed in RCRA Cluster XXIII. The next federal that will also be included in RCRA Cluster XXIII will be the E-Manifest rule which was signed by EPA Administrator on January 13, 2014. The E-Manifest rule will be online by October, 2015.
2d) Maintenance of legal authority necessary to carry out delegated program.	The State of Arkansas writes the federal RCRA regulations verbatim which are equivalent, consistent and some more stringent than the federal program.	There are no legal deficiencies with the state's statutes or regulations to carry out the hazardous waste management program.
Codification	RCRA Clusters XVI through XIX	EPA has prepared a Federal Register notice to codify the State for portions of RCRA Clusters XVI through XIX which is under review by Office of Regional Counsel.

SECTION 3: TECHNICAL ASSISTANCE/REVIEW PROCESS

3a) Permits reviewed to document if they are consistent with federal requirements; the review includes: public participation requirements, financial assurance (including cost estimates for closure/post-closure care) and compliance schedules.	EPA completed the review of a Class 3 modification for Clean Harbors, which incorporated the Metals Recovery Unit. No issues with the permit mod were identified during the review; however we did request that financial assurance information be updated in RCRAInfo.	No issues were identified during the permit review and ADEQ indicated the financial assurance information would be updated.
3b) Progress on permits listed on the renewal baseline.	ADEQ has no outstanding permit renewals	ADEQ has 2 permit renewals to accomplish from the 2015 baseline. The Austin Powder Company permit expires 8/13/2014 and the Aerojet permit expires 5/14/2015. In addition there is an operating permit for the Explosive Destruction System at Pine Bluff that expires 06/23/2015.
3c) Additional permits reviewed.	EPA completed a Permitting Program Review for ADEQ during an onsite review on December 2, 2013. The final document was sent to ADEQ on March 11, 2014.	The program review was conducted to document how well ADEQ is implementing the RCRA permitting program. Our review noted several program strengths including the permitting process and public access to information. ADEQ continues to implement the program in a manner consistent with EPA goals.
3d) Corrective Action documents are reviewed for technical and programmatic consistency with federal requirements.		<p>The Region has developed training for the States on institutional and engineering controls to assist staff with completing RAU determinations and entering applicable information into RCRAInfo.</p> <p>In the second half of the grant year, EPA will discuss with ADEQ scheduling the IC/EC training for state project managers. Timing and actual delivery method will be contingent on availability of travel funding and EPA/ADEQ staff availability.</p>

		<p>Southwestern Proving Ground Update for April 23, 2013: EPA staff has been participating with ADEQ in providing regulatory feedback to the Corps of Engineers regarding the SW Proving Ground munitions response site. The RI/FS investigation for the northern area of the site is in progress and will be completed in approximately 1 year. The RI/FS report has been issued for the southern area of the site (Wildlife Management Area) and the project for this area is in the remedy decision phase. The site is heavily contaminated with WWII ordnance materials. In addition, the COE is in the process of piloting the newer ordnance identification technology called Metal Mapper.</p>
3e) Corrective Action progress	<p>In the first half of the grant year, no Ready for Reuse candidate facilities were identified, and no area- or facility-wide Ready for Anticipated Use (RAU) determinations were coded in RCRAInfo. However, on April 2, 2014, ADEQ submitted to EPA supporting documentation for a number of area-specific RAU determinations at three facilities: Pine Bluff Arsenal (3 units), Little Rock Air Force Base (4 units), and Lion Oil Company (6 units). The documentation also included CA 725 determination forms for SWMU 32 at Little Rock Air Force Base and SWMU 83 at Pine Bluff Arsenal.</p> <p>ADEQ leads the Region in GPRA corrective action accomplishments with 100% Human Exposures controlled; 93% Contaminated Ground Water Controlled; 93% Remedies Selected and 80 % Remedies Constructed.</p>	

In 2012, EPA Headquarters asked each Region to conduct a non-GPRA facility corrective action workload evaluation. Fourteen facilities were initially identified in Arkansas via an RCRAInfo data pull. In December, a subsequent data pull by HQ identified an additional 10 facilities.

Parker Solvents is continuing to move forward with the limited RFI workplan submitted in November 2013 as a result of the 3013 issued by EPA.

The first phase of the workplan was a well survey which ECCI (consultants) completed in February and presented a summary on March 5, 2014.

After a conference call with ECCI it was decided that a limited sampling event would be completed to determine current conditions before deciding where additional monitoring wells would be installed. Results from this event will be submitted to EPA by the end of April, 2014.

EPA Region 6 provided Corrective Action training to ADEQ staff on December 3, 2013

SECTION 4: DATA MANAGEMENT PROCESS

4a) Updates databases in a timely manner

ADEQ enters information into the RCRAInfo database in a timely manner.

As of the mid-year the state has coverage of facilities that require Financial Assurance entered into RCRAInfo but the data is out of date for all facilities with an expiration date on their mechanisms.

Region 6 is in the process of performing comprehensive reviews of historical data in all RCRAInfo modules and will work with ADEQ to research and make corrections as needed. Region 6 will continue to work with ADEQ to address any data concerns or technical issues with uploading or entering the data into RCRAInfo that may arise.

ADEQ should update Financial Assurance data as soon as reasonably possible.

SECTION 5: SUSTAINABILITY PROGRAMS

5a) Evaluation of sustainability programs

ADEQ promotes pollution prevention and sustainability through its leadership program called the Arkansas Environmental Stewardship Award (ENVY). The ENVY award is presented annually to winners at the APC&E Commission's Meeting.

ADEQ participates in pollution prevention and sustainability conference calls with EPA and other States in Region 6.

EPA and the states work together to promote several national initiatives including the Sustainable Materials Management (SMM) Program, an approach to serving human needs by using/reusing resources most productively and sustainably throughout their life cycle, generally minimizing the amount of materials involved and all associated environmental impacts. The Federal Green Challenge (FGC) is one of the challenges under the SMM program to challenge EPA and other federal agencies throughout the country to lead by example in reducing the Federal Government's environmental impact. These approaches can assist both EPA and its regional states and other stakeholders to focus on sustainability and applicable processes to maximize environmental, social, and economic benefits. In addition, a new initiative, Green Sports is evolving and States are engaging. Based on the variety of activities surrounding sustainability, EPA Region 6 asks States to participate in a RCRA State Sustainability Network consisting of information sharing and collaboration through regular conference calls with EPA and State sustainability staff. The network can foster sustainability across the Region and support both EPA and State environmental and leadership programs.

Since these are voluntary programs, a state's participation is much appreciated and all state efforts will be viewed as enhancements to the overall RCRA program.

STATE SPECIFIC ISSUES		

FOLLOW-UP

ACTION ITEM	AGENCY RESPONSIBLE	DUE DATE
Sampling Training	EPA	EN Inspector Training in July
IC/EC Training	EPA/Jeanne Schulze	09/30/2014

CA Workplan Report

State of AR

Between 10/1/2013 and 4/1/2014

Event Comments	Facility Wide?	Area Name	Date	Event Code	Agy
EPA ID: ARD990661050 Facility Name: GENERAL DYNAMICS FACILITY					
		GPRA Facility	N		
Highland Industrial Park Deed Restriction (1), City of Camden Airport Deed Restriction (2), Ark. Hwy Dept. Deed Restriction (2), Biggers Deed Restriction (2), FedEx Deed Restriction (2), Tillery Williams Deed Restriction (2), Youngblood Deed Restriction (N	OFF-SITE	12/19/2013	CA772EP	S
Highland Industrial Park Deed Restriction (1), City of Camden Airport Deed Restriction (2), Ark. Hwy Dept. Deed Restriction (2), Biggers Deed Restriction (2), FedEx Deed Restriction (2), Tillery Williams Deed Restriction (2), Youngblood Deed Restriction (Y	FACILITY	12/19/2013	CA772EP	S

CA Workplan Report

State of AR

Between 10/1/2013 and 4/1/2014

Event: CA380 Date for public Notice on Proposed Remedy

Event Comments	Facility Wide?	Area Name	Date	Event Code	Agy
EPA ID: ARD006349724					
Facility Name: TIMEX CORPORATION					
		GPRA Facility			
		N			
	Y	AIRPORT PROPERTY	1/20/2014	CA380	S
	N	GROUNDWATER PLUME OFF-SITE	1/20/2014	CA380	S
EPA ID: ARD042755389					
Facility Name: WHIRLPOOL CORPORATION					
		GPRA Facility			
		N			
	Y	ENTIRE FACILITY	10/14/2013	CA380	S

CA Workplan Report

State of AR

Between 10/1/2013 and 4/1/2014

Event: CA400-Remedy Selection

Event Comments	Facility Wide?	Area Name	Date	Event Code	Agy
EPA ID: ARD006349724 Facility Name: TIMEX CORPORATION					
		GPRA Facility			
	N				
RADD FINAL CAO AMENDMENT EFFECTIVE	N	GROUNDWATER PLUME OFF-SITE	2/27/2014	CA400	S
RADD FINAL CAO AMENDMENT EFFECTIVE	Y	AIRPORT PROPERTY	2/27/2014	CA400	S
EPA ID: ARD042755389 Facility Name: WHIRLPOOL CORPORATION					
		GPRA Facility			
	N				
	Y	ENTIRE FACILITY	12/27/2013	CA400	S

CA Workplan Report

State of AR

Between 10/1/2013 and 4/1/2014

Event: CA550 - Remedy Constructed

Event Comments	Facility Wide?	Area Name	Date	Event Code	Agy
EPA ID: ARR000005413 Facility Name: COLTEC INDUSTRIES, INC. @ CENTRAL MOLONEY, INC.					
		GPRA Facility	N		
Construction completion of groundwater treatment system.	N	PCB CONTAMINATED AREA	11/5/2013	CA550RC	S
Construction completion of groundwater treatment system.	Y	ENTIRE FACILITY	11/5/2013	CA550RC	S
EPA ID: ARD007028913 Facility Name: MUELLER COPPER TUBE PRODUCTS, INC.					
		GPRA Facility	N		
GW EXTRACTION WELLS TCE REMOVAL AND RE-INJECTION WELLS	Y	ENTIRE FACILITY	2/18/2014	CA550RC	S

Workplan Report

State of AR

Between 10/1/2013 and 4/1/2014

Report 3: Final Determinations

Event Comments	Series Name	Code	Unit Name	Lg/Op Sta	Data #	Date	Event Code	Agg
EPA ID: ARD069748192	Facility Name: CLEAN HARBORS EL DORADO, LLC		GPRA Permit N		GPRA Renewal	N		
Class3 - Add Bulb Recycling Unit - M015	10HRN1	X02	BULB RECYCLING UNIT	PIOP	3	12/13/2013	OP240AU	S
Class3 - Add Bulb Recycling Unit - M015	10HRN1	X02	BULB RECYCLING UNIT	PIOP	3	12/13/2013	OP242NS	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	X02	BULK SOLIDS SHREDDER	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	X02	BULK SOLIDS SHREDDER	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	DRS BLDG K	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	DRS BLDG K	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	DRS BLDG L	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	DRS BLDG L	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	T03	INCIN	PIOP	8	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	T03	INCIN	PIOP	8	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	ROLL-OFF STORAGE	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	ROLL-OFF STORAGE	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 144	PICN	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 144	PICN	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 567	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 567	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 568	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 568	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 610	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 610	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 611	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 611	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 612	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 612	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 613	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 613	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 614	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 614	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 615	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 615	PIBC	2	12/13/2013	OP242SI	S

Workplan Report

State of AR

Between 10/1/2013 and 4/1/2014

Report 3: Final Determinations

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Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	DRS BLDG K	PIBC	2	12/13/2013	OP240CB	S
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Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	DRS BLDG L	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	DRS BLDG L	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	T03	INCIN	PIOP	8	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	T03	INCIN	PIOP	8	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	ROLL-OFF STORAGE	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	ROLL-OFF STORAGE	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 144	PICN	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 144	PICN	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 567	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 567	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 568	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 568	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 610	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 610	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 611	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 611	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 612	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 612	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 613	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 613	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 614	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 614	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 615	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S02	TANK 615	PIBC	2	12/13/2013	OP242SI	S

Workplan Report

State of AR

Between 10/1/2013 and 4/1/2014

Report 3: Final Determinations

Event Comments	Series Name	Code	Unit Name	Lg/Op Sta	Data #	Date	Event Code	Agy
EPA ID: ARD069748192 Facility Name: CLEAN HARBORS EL DORADO, LLC								
			GPRA Permit N		GPRA Renewal	N		
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	UNIT 44 DOCK	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	S01	UNIT 44 DOCK	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	T03	UNIT 44 INCINERATOR	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	T03	UNIT 44 INCINERATOR	PIBC	2	12/13/2013	OP242SI	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	X02	UNIT 44 SHREDDER	PIBC	2	12/13/2013	OP240CB	S
Class 3 - Add Incinerator & Support Units - M014	10HRN1	X02	UNIT 44 SHREDDER	PIBC	2	12/13/2013	OP242SI	S
EPA ID: ARD981057870 Facility Name: RINECO CHEMICAL INDUSTRIES, INC								
			GPRA Permit N		GPRA Renewal	N		
M006 - Modify Shredder M-106	28H-RN1	X02	SHREDDER M-106	PIBC	3	1/14/2014	OP240OH	S
M006 - Modify Shredder M-106	28H-RN1	X02	SHREDDER M-106	PIBC	3	1/14/2014	OP242SI	S

Workplan Report

State of AR

Between 10/1/2013 and 4/1/2014

Report 5: Closure Verification

Event Comments	Series Name	Code	Unit Name	Lg/Op Sta	Data #	Date	Event Code	Agy
EPA ID: ARD069748192	Facility Name: CLEAN HARBORS EL DORADO, LLC		GPRA Permit	N	GPRA Renewal	N		
	CL TANK 1 - PARTIAL CLOSU	S02	TANK 1	PICC	3	3/10/2014	CL380CA	S

Midyear of FY14 Ending March 31, 2014

- * Can be a major mod instead but verbal commitment to 3 renewals
- ** Can be in any of the 3 categories for a total of 3 determinations
- *** Near completion of corrective action

